24

25

26

27

28

1	Anthony L. Martin		
2	Nevada Bar No. 8177 anthony.martin@ogletreedeakins.com		
3	Dana B. Salmonson Nevada Bar No. 11180		
4	dana.salmonson@ogletreedeakins.com	D.C.	
5	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. Wells Fargo Tower		
6	Suite 1500 3800 Howard Hughes Parkway		
7	Las Vegas, NV 89169 Telephone: 702.369.6800		
8	Fax: 702.369.6888		
9	Attorneys for Defendant Wal-Mart Associates, Inc.		
10	UNITED STATES DISTRICT COURT		
11	FOR THE DISTRICT OF NEVADA		
12 13	CHRISTOPHER NELSON, on behalf of himself and all others similarly situated,	Case No.: 3:21-cv-00066-MMD-CLB	
14	Plaintiff,	STIPULATION AND ORDER FOR AN	
15	vs.	EXTENSION OF TIME TO FILE FIRST AMENDED JOINT CASE	
16	WAL-MART ASSOCIATES, INC. and DOES 1 through 50, inclusive,	MANAGEMENT REPORT	
17	Defendant(s).	(FIRST REQUEST)	
18			
19			
20	Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Christopher Nelson ("Plaintiff"		
	Defendant Wal-Mart Associates, Inc. ("Defendant"), by and through their respective counse		
21	record, hereby request and stipulate to extend the time for the parties to submit their First Amer		
22	Joint Case Management Report. (ECF No. 26.) The current deadline to file the First Amended		
23	5 (= · · · · 2 · · ·)		

lson ("Plaintiff") and espective counsel of their First Amended First Amended Joint Case Management Report is June 21, 2021. (Id.) The parties request an extension of time up to and including July 1, 2021 in which to file the same. This is the parties' first request for an extension of time.

Good cause exists to extend the deadline to file the parties' First Amended Joint Case Management Report. On June 7, 2021 the parties appeared for a Case Management Conference with 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

23

24

25

26

27

28

Judge Baldwin wherein she Ordered that the parties meet and confer regarding a realistic time frame for bifurcated discovery and, thereafter, to submit a Discovery Plan and Scheduling Order no later than June 21, 2021. On June 11, 2021, the parties met and conferred to discuss the content of the First Amended Joint Case Management Report, including relevant discovery deadlines. Joshua B. Buck appeared on behalf of Plaintiff and Dana B. Salmonson appeared on behalf of Defendant. The parties are still working through the provisions within the First Amended Joint Case Management Report pursuant to the Court's instruction and would like the additional time to discuss the proposed language with their respective clients and see if they can come to some form of

resolution. As such, the parties stipulate to an extension of ten (10) days to afford the parties a

reasonable period of time to further meet and confer on the content of the proposed First Amended

This Stipulation is made in good faith and is not intended for purposes of delay.

DATED this 21st day of June, 2021.	DATED this 21st day of June, 2021.
------------------------------------	------------------------------------

THIERMAN BUCK LLP OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

/s/ Joshua D. Buck /s/ Dana B. Salmonson

Triani Iti Illiani	Tillian July 20 Iviai viii
Nevada Bar No. 8285	Nevada Bar No. 8177
Joshua D. Buck	Dana B. Salmonson
Nevada Bar No. 12187	Nevada Bar No. 11180
Leah L. Jones	Wells Fargo Tower
Nevada Bar No. 13161	Suite 1500
Joshua R. Hendrickson	3800 Howard Hughes Parkway
Nevada Bar No. 12225	Las Vegas, NV 89169
7287 Lakeside Drive	Attorneys for Defendant Wal-Mart Associates, Inc.
D NII 00711	

Reno, NV 89511 22 Attorneys for Plaintiff Christopher Nelson

Joint Case Management Report.

Mark R. Thierman

ORDER

IT IS SO ORDERED.

June 21, 2021

Anthony L. Martin

DATED